

TOGUT, SEGAL & SEGAL LLP
One Penn Plaza, Suite 3335
New York, New York 10119
Telephone: (212) 594-5000
Facsimile: (212) 967-4258
Scott E. Ratner
Richard K. Milin
Michael D. Hamersky

PRESENTMENT DATE: 11/21/11 @ 12:00 NOON
OBJECTION DEADLINE: 11/21/11 @ 11:00 A.M.

Conflicts Counsel to the Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY,
et al.,

Reorganized Debtors.

)
) Chapter 11
)
) Case No. 09-50026 (REG)
)
)
) (Jointly Administered)
)

NOTICE OF PRESENTMENT OF STIPULATION AND AGREED ORDER
APPROVING A PARTIAL RESOLUTION OF CERTAIN CLAIMS ASSERTED
AGAINST THE REORGANIZED DEBTORS BY CHARTIS SPECIALTY
INSURANCE COMPANY AND LEXINGTON INSURANCE COMPANY

PLEASE TAKE NOTICE that the above-captioned Reorganized Debtors Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated entities in the above-captioned cases (collectively, “**MLC**”) and Chartis U.S. (“**Chartis**” and, together with MLC, the “**Parties**”), each by their undersigned counsel, will present the annexed Stipulation and Agreed Order approving a partial resolution of certain claims asserted against the Reorganized Debtors by Chartis Specialty Insurance Company and Lexington Insurance Company (the “**Stipulation and Agreed Order**”) to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in his Chambers, Room 527, at the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, for signature on November 21, 2011 at 12:00 Noon (the “**Presentment Date**”); and

PLEASE TAKE FURTHER NOTICE that objections, if any, to the

proposed Stipulation and Agreed Order must be made in writing and received in Judge Gerber's Chambers, Room 627 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, and by November 21, 2011 at 11:00 a.m. (the "**Objection Deadline**"). Unless objections are received by that time, the Order may be signed on the Presentment Date.

PLEASE TAKE FURTHER NOTICE, that pursuant to General Order M-399¹, any objection filed by parties with legal representation shall be filed on or before the Objection Deadline (i) through the Bankruptcy Court's Electronic Case Filing System ("**ECF**")² which may be accessed at the Bankruptcy Court's Internet web site at www.nysb.uscourts.gov, using Netscape Navigator software version 3.0 or higher, and (ii) in portable document format ("**PDF**") using Adobe Exchange software for conversion.

PLEASE TAKE FURTHER NOTICE, that any party that is either without legal representation or that is unable to file documents electronically shall file its objection on or before the Objection Deadline in .PDF format on a CD in an envelope clearly marked with the case name, case number, type and title of document, document number of the document to which the objection refers and the file name of the document.

PLEASE TAKE FURTHER NOTICE, that objections, if any, must be served in accordance with the provisions of General Order M-399 so that they are **received** on or before the Objection Deadline by (i) conflicts counsel to Motors

¹ Copies of General Order M-399 and the User's Manual for the Bankruptcy Court's Electronic Case Filing System are available at the official web site of the United States Bankruptcy Court for the Southern District of New York at www.nysb.uscourts.gov.

² Filing documents on the ECF requires a password, which an attorney may obtain by contacting the Bankruptcy Court's technical assistance department at (212) 668-2870, ext. 3522, Monday through Friday, 8:30 a.m. to 5:00 p.m.

Liquidation Company, et al., Togut, Segal & Segal, One Penn Plaza, Suite 3335, New York, New York, Attn.: Scott E. Ratner, Esq. and Richard K. Milin, Esq.; (ii) Zeichner, Ellman & Krause LLP, counsel for Chartis U.S., 575 Lexington Avenue, New York, New York 10022, Attn: Michael S. Davis, Esq. (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, New York, New York 10004, Attn: Tracey Hope Davis, Esq.; (iv) Kramer Levin Naftalis & Frankel LLP, counsel to the Unsecured Creditors Committee, 1177 Avenue of the Americas, New York, New York 10036, Attn.: Thomas Moers Mayer, Esq. and Robert T. Schmidt, Esq. (v) Gibson, Dunn & Crutcher, LLP, counsel to Wilmington Trust Company, 200 Park Avenue, 47th Floor, New York, New York 10166, Attn.: David M. Feldman, Esq., and Keith Martorana, Esq., (vi) King & Spalding, LLP, counsel to General Motors LLC, 1185 Avenue of the Americas, New York, New York 10036, Attn.: Scott Davidson, Esq., (vii) Bingham McCutchen LLP, counsel to Deutsche Bank AG, 399 Park Avenue, New York, New York 10022, Attn.: Robert M. Dombroff, Esq., Jeffrey S. Sabin, Esq., and Jared R. Clark, Esq., (viii) Lev L. Dassin, Acting United States Attorney for the Southern District of New York on behalf of the United States Department of Treasury, 86 Chambers Street, Third Floor, New York, New York 10007, Attn.: David S. Jones, Esq., Jeffrey S. Oestericher, Esq., Matthew L. Schwartz, Esq. and Joseph N. Cordaro, Esq., Assistant United States Attorneys (ix) any party in interest having filed a notice of appearance.

PLEASE TAKE FURTHER NOTICE that if no objections to the Stipulation and Agreed Order are timely filed, served and received in accordance with

the terms hereof, the Bankruptcy Court may enter an order approving the Stipulation and Agreed Order without further notice.

DATED: New York, New York
November 7, 2011

MOTORS LIQUIDATION COMPANY, *et al.*
By their Conflicts Counsel,
TOGUT, SEGAL & SEGAL LLP
By:

/s/ Richard K. Milin

Scott E. Ratner
Richard K. Milin
One Penn Plaza, Suite 3335
New York, New York 10119
(212) 594-5000